

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In Re: David Moore §
 § Bankruptcy Case No. 10-40579-H1-12
 Lisa Therese Moore §

RESPONSE IN OPPOSITION TO MOTION TO LIFT STAY (DKT No. 85)

REQUEST FOR HEARING

On January 9, 2012, at 8:52 p.m. I contacted Christina Camarrata by email but has not received a response (and had previously spoken on the phone) in an effort to work things out, but as of yet they are not successful and a hearing may be required.

The Debtors respond as follows to the motion:

1. Admit.
2. Admit.
3. Admit.
4. Deny as of now, in fact Movant approved of it after reviewing it and signed off on the proposed confirmation order (Dkt. No. 88).
5. Deny as of now, as Debtors made their payment although a couple of days late.
6. Deny.
7. Deny, and the Court's required approval of all parties, which the Trustee wanted to be done explicitly in the confirmation order, and the Court did not set a specific date for completion. Furthermore, Debtors would show that their counsel's health problems slowed down completion as well as travel and the Thanksgiving holiday.

8. Deny.

9. Deny.

Respectfully Submitted,

1/9/12
Date

/s/ Alexander B. Wathen
Alexander B. Wathen
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CERTIFICATE OF SERVICE

I certify that on **January 9, 2012**, I have or am contemporaneously serving a copy of these documents with all attachments on those entities listed below either by first class mail or through the Clerk by electronic mail.

1/9/12
Date

/s/ Alexander B. Wathen
Alexander B. Wathen

BY ELECTRONIC MEANS THROUGH THE CLERK OR BY FIRST CLASS MAIL:

Christina Camarrata, for Movant

Ronald H. Tonkin, for Lisa Bushman

Chapter 12 Trustee & U.S. Trustee

Ay others receiving ECF notices.